



State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
 DIVISION OF HAZARDOUS WASTE MANAGEMENT
 CN 028
 Trenton, N.J. 08625-0028
 (609) 633-1408
 Fax # (609) 633-1454

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
NO. P 905 517 912

JUL 02 1990

Cris Anderson, Manager
 Environmental Affairs
 L.E. Carpenter
 Suite 3600
 1301 Ninth Street
 Cleveland, OH 44114-1824

Dear Mr. Anderson:

Re: L.E. Carpenter
 Amended ACO signed September 26, 1986
 Supplemental Sampling Plan

The New Jersey Department of Environmental Protection (Department) has reviewed the Supplemental Sampling Plan dated June 1, 1990 submitted by Weston Services, Inc. and has prepared the following comments:

1. Table 3.2, Summary of Supplemental Sampling. The sample points/locations do not have sample numbers assigned to them. Each sample point must have a sample number or some other designation assigned, for ease of reference.
2. The proposed samples, to be collected near TP2 and TP3 for PCB analysis, must include analysis for VO+10 and BN+10. Previous sampling at these locations showed elevated levels of VOC's in the soils.
3. The Department suggested previously that the abandoned Rockaway Valley Sewerage Authority sewer line may be acting as a conduit for contaminant transfer. Although the reasoning presented by Weston in the Supplemental Sampling Plan suggests otherwise, soil samples collected in the area of the sewer line (TP2 and TP3) showed the presence of VOC's and BN's.

In order to determine whether the contamination has reached the sewer line, one soil boring must be completed at the west end (steel and plug) of the sewer line and samples collected at an 18 to 24 inch depth and one at a depth of 6 inches below the base of the sewer line or immediately above ground water, if encountered.

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4. In previous comments concerning the Remedial Investigation, November 1990, the Department had recommended that a surface water and sediment sample be collected at the location along the Rockaway River adjacent to the Former Impoundment Area. In order to assess the extent of contaminant discharge to the river, one surface water and sediment sample must be collected at the Rockaway River directly south of MW-4. Analyses must include VO+10, BN+10 and TAL metals. This location must be sampled in addition to the proposed sample location 500 feet downstream from the site.
5. Quality Assurance/Quality Control, page 29. The laboratory analyses to be performed on samples collected at the site must be in accordance with USEPA CLP methodology.

The Supplemental Sampling Plan fails to provide the following information as required by EPA, (Guidance for Conducting Remedial Investigations and Feasibility Studies Under CERCLA, EPA/540/g-89/004) in preparing a Quality Assurance Plan.

- * Summary of analytical methods and laboratory reporting limits.
- * Description of the method calibration procedures.

A revised Quality Assurance Plan must be reviewed and approved by NJDEP before field work commences.

Please submit a revised sampling plan with the deficient materials by July 18, 1990, in order for the Department to complete its review for approval.

Should you have any questions, contact me at (609) 633-1455.

Very truly yours,



Edgar G. Kaup, P.E., Case Manager
Bureau of Federal Case Management

EGK:cn

c: V. Cappello, WSI
J. Josephs, EPA
J. Prendergast, BEERA
G. Blyskun, BGWPA